IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Philadelphia Federal Credit Union CHAPTER 13 Movant v.s David Adenaike FILED 16-13307-amc Debtor NO FEB 1 5 2019 David Adenaike Debtor 11 U.S.C. Section 362 William C. Miller Esq. **Trustee**

MOTION TO DISALLOW.

HONORABLE UNITED STATES BANKRUPTY JUDGE:

David Adenaike ("Debtor"). David Adenaike is filling Motion to object to Philadelphia Federal Credit Union Motion for Relief from the Automatic Stay ("Motion"), and in support thereof.

Dear Honorable Judge Ashley M. Chan, I pray you to consider my plea to disallow Relief from the Automatic Stay and any foreclosure plan from the Philadelphia Federal Credit Union

Reasons shown below;

- 1. David Adenaike contacted the Philadelphia Federal Credit Union lawyer, Mr. Jason Schwartz, on January 4, 2019. Mr. Jason was contacted in written and by telephone, in order to work out a plan to pay the outstanding balance between October, 2018 November, 2018 and December, 2018. Both parties have been talking about timeframe to pay off the post petitions arrears
- 2. David Adenaike has paid the current mortgage for the months of January 9, 2019 and February 9, 2019. I will also continue to make regular payments promptly.
- **3.** David Adenaike also make an extra payment toward the outstanding balance in January, 2019 and February, 2019.
- 4. David Adenaike ("Debtor") respectfully objects to Motion for Relief from the Automatic Stay and any foreclosure plan by the credit union. Upon final hearing of this Motion:

Very Truly yours,

David Adenaike